

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re:)	
)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,)	
)	Chapter 11
Debtor.)	
)	
_____)	
)	
CDS BUSINESS SERVICES, INC. d/b/a)	
NEWTEK BUSINESS CREDIT,)	
)	
Plaintiff,)	
)	
v.)	Adv. Proc. No. 3:20-ap-90140
)	
)	
AMERICA CARES TRUST (ACT) d/b/a)	
CARENATION)	
)	
Defendant.)	

**AMENDED MOTION TO WITHDRAW
AND TO STAY DEADLINE FOR RESPONSE TO
MOTION TO FILE AMENDED AND SUPPLEMENTAL COMPLAINT**

Pursuant to Local Rule LBR 2091-1, the undersigned counsel Bone McAllester Norton PLLC, Sam J. McAllester III and William J. Haynes, III respectfully move to withdraw as counsel for America Cares Trust (ACT) d/b/a CareNation.

The undersigned counsel respectfully request that Defendant have thirty (30) days to find new counsel and to answer Plaintiff CDS Business Services, Inc. d/b/a Newtek Business Credit's Motion to File an Amended and Supplemental Complaint (Doc. No. 76), which was filed on August 17, 2021.

Respectfully submitted,

BONE McALLESTER NORTON PLLC

By: /s/ Sam J. McAllester III
/s/ William J. Haynes III
Sam J. McAllester III #3461
William J. Haynes III #017398
Nashville City Center
511 Union Street, Suite 1000
Nashville, TN 37219
(615) 238-6300 (telephone)
(615) 238-6301 (facsimile)
smcallester@bonelaw.com
whaynes@bonelaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following via ECF, this the 20th day of August, 2021.

Daniel H. Puryear, Esq.
M. Andrew Pippenger, Esq.
Puryear Law Group Pllc
104 Woodmont Blvd., Suite 201
Nashville, Tn 37205
Dpuryear@Puryearlawgroup.Com
*Counsel For Plaintiff Cds Business
Services, Inc. D/B/A Newtek Business Credit*

David W. Houston IV, Esq.
Emily Campbell Taube, Esq.
Burr & Forman LLP
222 Second Avenue South
Suite 2000
Nashville, TN 37201

Michael Gigandet, Esq.
Law Office of Michael Gigandet
208 Centre St
Pleasant View, TN 37146

Natalie M. Cox, Esq.
Megan Reed Seliber, Esq.
US Dept of Justice
Office of the US Trustee

701 Broadway, Ste 318
Nashville, TN 37203

/s/ William J. Haynes III